

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JACKIE EPPS, as Putative)
Administratrix of the Estate of)
ANNIE MAE SETZER,)
Plaintiff,)
vs.)
JOHNSON & JOHNSON,)
JOHNSON & JOHNSON)
CONSUMER, INC., JOHNSON)
& JOHNSON CONSUMER)
COMPANIES, INC., JOHNSON)
& JOHNSON CONSUMER)
PRODUCTS COMPANY, and)
IMERYS TALC AMERICA,)
INC., F/K/A LUZENAC)
AMERICA, INC.)
Defendants.)

JURY TRIAL DEMANDED

**DEFENDANT IMERYS TALC AMERICA, INC.'S CERTIFICATE OF
INTERESTED PERSONS AND CORPORATE DISCLOSURE
STATEMENT**

Pursuant to Rule 3.3 of the Local Rules of the United States District Court for the Northern District of Georgia and Federal Rule of Civil Procedure 7.1, Defendant IMERYS TALC AMERICA, INC., f/k/a LUZENAC AMERICA, INC. (“Defendant Imerys”), a Delaware Corporation, states:

1. The undersigned counsel of record for Defendant Imerys certifies that the following is a full and complete list of all parties in this action, including any

parent corporation and any publicly held corporation that owns 10% or more of the stock of Defendant:

- a. Plaintiff: Jackie Epps
- b. Defendant Imerys: Imerys Mineral Holding Limited (UK) owns 100% of the shares of Imerys Talc America, Inc. Imerys USA, Inc., owns 100% of the shares of Imerys Minerals Holding Limited (UK). Imerys S.A. owns 100% of the shares of Imerys USA, Inc. Imerys S.A. is publicly traded on NYSE Euronext Paris.
- c. Defendant Johnson & Johnson :Unknown
- d. Defendant Johnson & Johnson Consumer Inc. f/k/a Johnson & Johnson Consumer Companies, Inc.: Unknown

2. The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest or other interest which could be substantially affected by the outcome of this particular action:

- a. Plaintiff: Jackie Epps
- b. Defendant Imerys: Imerys Mineral Holding Limited (UK) owns 100% of the shares of Imerys Talc America, Inc. Imerys USA, Inc., owns 100% of the shares of Imerys Minerals Holding Limited (UK). Imerys S.A. owns 100% of the shares of Imerys USA, Inc. Imerys S.A. is publicly traded on NYSE Euronext Paris.
- c. Defendant Johnson & Johnson :Unknown

- d. Defendant Johnson & Johnson Consumer Inc. f/k/a Johnson & Johnson Consumer Companies, Inc.: Unknown
- 3. The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:
 - a. Plaintiff: Thomas F. Cuffie
THE CUFFIE LAW FIRM
3080 Campbellton Road Southwest
Atlanta, GA 30311
 - b. Defendant Imerys: Leslie K. Eason
GORDON & REES LLP
3455 Peachtree Road
Suite 1500
Atlanta, Georgia 30326
 - c. Defendant Johnson & Johnson: Unknown
 - d. Defendant Johnson & Johnson Consumer Inc.
f/k/a Johnson & Johnson Consumer
Companies, Inc.: Unknown

Submitted this 24th day of October, 2016.

GORDON & REES LLP

/s/ Leslie K. Eason
Leslie K. Eason
Georgia Bar No. 100186
3455 Peachtree Road, Suite 1500
Atlanta, Georgia 30326
Tel: (404) 869-9054
Fax: (678) 389-8475
leason@gordonrees.com

Certificate of Service

I hereby certify that on 24th day of October, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system to:

Thomas F. Cuffie
THE CUFFIE LAW FIRM
3080 Campbellton Road Southwest
Atlanta, GA 30311
tcuffie@cuffielawfirm.com

Attorneys for Plaintiff

/s/ Leslie K. Eason

Leslie K. Eason